

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

REDCELL CORP., and REDCELL
SYSTEMS, LLC,

Plaintiffs,

v.

A.J. TRUCCO, INC. and TRUCCONOVA,
LLC,

Defendants.

No. 1:20-cv-00018-JGLC-SLC

**DEFENDANTS' NOTICE OF MOTION *IN LIMINE* NO. 1
TO EXCLUDE CERTAIN DOCUMENTS ON PLAINTIFFS' EXHIBIT LIST BASED ON
THEIR FAILURE TO COMPLY WITH THIS COURT'S NOVEMBER 2, 2023 ORDER
(ECF NO. 111)**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, and the Declaration of Lawrence Bluestone, Esq., with Exhibits, Defendants A.J. Trucco, Inc. and Trucconova, LLC. (“Defendants”) will move before the Hon. Jessica G.L. Clarke, U.S.D.J., at a date and time to be designated by the Court, for an Order, *in limine*, to exclude certain of Plaintiffs’ exhibits based on their failure to comply with this court’s November 2, 2023 order.

In accordance with the Court’s Order, dated August 3, 2023 (Minute Entry) and Order dated November 2, 2023 (ECF No. 111), responses to Defendants’ Motion *In Limine* shall be filed by November 20, 2023.

Dated: November 13, 2023
New York, NY

Respectfully submitted,
GENOVA BURNS LLC

By: /s/ Lawrence Bluestone
Rajiv D. Parikh, Esq.
Charles J. Messina, Esq.
Lawrence Bluestone, Esq.
GENOVA BURNS LLC
Trinity Centre
115 Broadway, 15th Floor
New York, NY 10006
Phone: 212-566-7188
rparikh@genovaburns.com
cmessina@genovaburns.com
lbluestone@genovaburns.com

*Attorneys for Defendants A.J. Trucco,
Inc. and Trucconova, LLC*

17307137v1 (22605.010)